

LIST OF EXHIBITS AND WITNESSES

Case No.	3:19-cv-01657-JR	Judge Jolie A. Russo
Title	Suzanne Ivie	
	vs. AstraZeneca Pharmaceuticals, LP	
Dates of Hearing/Trial	6/14/21 - 6/22/21	
Court Reporters	Dennis Apodaca	
Deputy Clerks	G. Magnuson	

Attorney for Govt / Plaintiff	Attorney for Defendant
Robert Scott Oswald; Anita Mazumdar Chambers	Melinda Riechert; Ryan McCarthy; Anne Talcott

Govt / Ptf			Def			Date	WITNESS / EXHIBIT DESCRIPTION	Called b y
Ex. No.	ID	Ev	Ex. No.	ID	Ev			
							6/15/21	
							Michael Mario Pomponi	π
68	✓	R					(See attached exhibit lists)	
75	✓	R					“	
80	✓	R					“	
79	✓	R					“	
77	✓	R					“	
75	✓	R					“	
46	✓	R					“	
67	✓	R					“	
81	✓	R					“	
80	✓	R					“	

R=Received; N=Not Received; W=Withdrawn/Not Offered

(191657-TrialWitExhList.wpd)

LIST OF WITNESSES AND EXHIBITS
(Continued)

pg. 2

Case No.			Title					
3:19-cv-01657-JR			Ivie v. AstraZeneca Pharmaceuticals LP					
Govt / Ptf			Def			Date	WITNESS / EXHIBIT DESCRIPTION	Called b y
Ex. No.	ID	Ev	Ex. No.	ID	Ev			
							Amy Welch (video)	π
							Dawn Cheree Ceaser	π
39	✓	R					(See attached exhibit lists)	
46	✓	R					“	
111	✓	R					“	
73	✓	R					“	
10	✓	R					“	
73	✓	R					“	
57	✓	R					“	
			519	✓	R		“	
77	✓	R					“	
37	✓	N					“	
73	✓	R					“	
							Karen Belknap	π
82	✓	R					(See attached exhibit lists)	
81	✓	R					“	
91	✓	R					“	
18	✓	R					“	
5	✓	R					“	
177	✓	R					“	
145	✓	R					“	
23	✓	R					“	
15	✓	R					“	
27	✓	R					“	
							6/16/21	

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LIST OF WITNESSES AND EXHIBITS
(Continued)

pg. 3

Case No. 3:19-cv-01657-JR						Title Ivie v. AstraZeneca Pharmaceuticals LP		
Govt / Ptf			Def			Date	WITNESS / EXHIBIT DESCRIPTION	Called b y
Ex. No.	ID	Ev	Ex. No.	ID	Ev			
							Karen Belknap (cont'd)	π
			501	✓	R		(See attached exhibit lists)	
91	✓	R					“	
			502	✓	R		“	
			503	✓	R		“	
			518	✓	R		“	
			506	✓	R		“	
19	✓	R					“	
94	✓	R					“	
			525	✓	R		“	
84	✓	R					“	
82	✓	R					“	
58	✓	R					“	
91	✓	R					“	
88	✓	R					“	
99	✓	R					“	
100	✓	R					“	
							Stephanie DiNunzio	π
21	✓	R					(See attached exhibit lists)	
77	✓	R					“	
5	✓	R					“	
9	✓	R					“	
13	✓	R					“	
23	✓	R					“	
14	✓	R					“	

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LIST OF WITNESSES AND EXHIBITS
(Continued)

pg. 4

Case No. 3:19-cv-01657-JR						Title Ivie v. AstraZeneca Pharmaceuticals LP		
Govt / Ptf			Def			Date	WITNESS / EXHIBIT DESCRIPTION	Called b y
Ex. No.	ID	Ev	Ex. No.	ID	Ev			
201	✓	R					(See attached exhibit lists)	
15	✓	R					“	
57	✓	R					“	
			519	✓	R		“	
			522	✓	R		“	
			520	✓	R		“	
			504	✓	R		“	
			507	✓	R		“	
5	✓	R					“	
23	✓	R					“	
14	✓	R					“	
24	✓	R					“	
57	✓	R					“	
			519	✓	R		“	
			538	✓	R		“	
			523	✓	R		“	
			542	✓	R		“	
			539	✓	R		“	
73	✓	R					“	
92	✓	R					“	
			509	✓	R		“	
			517	✓	R		“	
25	✓	R					“	
			505	✓	R		“	
			508	✓	R		“	

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LIST OF WITNESSES AND EXHIBITS
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pg. 5

Govt / Ptf			Def			Date	WITNESS / EXHIBIT DESCRIPTION	Called b y
Ex. No.	ID	Ev	Ex. No.	ID	Ev			
			531	✓	R		(See attached exhibit lists)	
			544	✓	R		“	
31	✓	R					“	
15	✓	R					“	
							Linda M. Truax	π
							6/17/21	
							Suzanne Ivie	π
31	✓	R					(See attached exhibit lists)	
			545	✓	R		“	
75	✓	R					“	
69	✓	R					“	
29	✓	R					“	
30	✓	R					“	
8	✓	R					“	
81	✓	R					“	
177	✓	R					“	
46	✓	R					“	
61	✓	R					“	
67	✓	R					“	
			533	✓	R		“	
			539	✓	R		“	
			540	✓	R		“	
			522	✓	R		“	
			520	✓	R		“	
			504	✓	R		“	

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(Continued)

pg. 6

Case No.			Title					
3:19-cv-01657-JR			Ivie v. AstraZeneca Pharmaceuticals LP					
Govt / Ptf			Def			Date	WITNESS / EXHIBIT DESCRIPTION	Called b y
Ex. No.	ID	Ev	Ex. No.	ID	Ev			
							Barbara McCullough (video)	π
58	✓	R					(See attached exhibit lists)	
87	✓	R					“	
81	✓	R					“	
67	✓	R					“	
59	✓	R					“	
67	✓	R					“	
177	✓	R					“	
							Suzanne Ivie (cont’d)	π
			507	✓	R		(See attached exhibit lists)	
			508	✓	R		“	
			531	✓	R		“	
123	✓	R					“	
75	✓	R					“	
29	✓	R					“	
91	✓	R					“	
81	✓	R					“	
94	✓	R					“	
92	✓	R					“	
							Cheryl Johnson (video)	π
129	✓	R					(See attached exhibit lists)	
							Jenny Capell	π
							Suzanne Ivie (cont’d)	π
143	✓	R					(See attached exhibit lists)	
							Judy L. Gibb	π

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LIST OF WITNESSES AND EXHIBITS
(Continued)

pg. 7

Case No.

3:19-cv-01657-JR

Title

Ivie v. AstraZeneca Pharmaceuticals LP

Govt / Ptf			Def			Date	WITNESS / EXHIBIT DESCRIPTION	Called b y
Ex. No.	ID	Ev	Ex. No.	ID	Ev			
							Laura Dawn Benson	π
							Scott Severt	π
							6/18/21	
							Richard Edelman (video)	π
3	✓	R					(See attached exhibit lists)	
2	✓	R					“	
4	✓	R					“	
							Larry Hinson	π
			522	✓	R		(See attached exhibit lists)	
							Genie Yu Hamilton	Δ
			522	✓	R		(See attached exhibit lists)	
							Craig Barnes	Δ
			555	✓	R		(See attached exhibit lists)	
							Amy Welch	Δ
			510	✓	R		(See attached exhibit lists)	
67	✓	R					“	
58	✓	R					“	
			526	✓	R		“	
			527	✓	R		“	
			528	✓	R		“	
			529	✓	R		“	
			530	✓	R		“	
			555	✓	R		“	
							Edward J. Bierhanzl	Δ
3	✓	R					(See attached exhibit lists)	

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(Continued)

pg. 8[illegible]

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

SUZANNE IVIE,

Plaintiff,

V.

ASTRAZENECA PHARMACEUTICALS LP,

Defendant.

Case No.: 3:19-cv-01657-JR

PLAINTIFF'S SECOND AMENDED TRIAL EXHIBIT LIST

PLAINTIFF'S SECOND AMENDED TRIAL EXHIBIT LIST

Plaintiff Suzanne Ivie submits the following list of exhibits which may be used at trial. Plaintiff also reserves the right to amend this list and add additional exhibits, including rebuttal and impeachment exhibits. This list has been amended to include one additional impeachment exhibit and Plaintiff's Trial Exhibits 198 through 200. Additionally, the Bates End numbers on Exhibits 23 and 67 have been corrected to reflect the pages contained in the exhibit.

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
1			AZ Annual Report			
2			Edelman Backpay Table			
3			Edelman Frontpay Table			
4			Edelman Total Damages Table			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
5	AZ00000001	AZ00000002	Email from DiNunzio to Belknap re: Ivie coaching assessment			
6	AZ00000003	AZ00000003	Coaching Assessment - January 2019			
7	AZ00000004	AZ00000004	Email from Ivie to Pomponi, Belknap re: Daliresp indication.			
8	AZ00000005	AZ00000005	Pomponi to Ivie re: Daliresp off-label marketing.			
9	AZ00000006	AZ00000006	Email from DiNunzio to Belknap re: Ivie coaching data			
10	AZ00000008	AZ00000008	Investigation Follow-up Documents from Broussard to Madalina			
11	AZ00000009	AZ00000009	COPD Statistics_January 2019 - Broussard Email attachments			
12	AZ00000010	AZ00000010	Email from Broussard to team re: COPD insights			
13	AZ00000011	AZ00000012	Email between Belknap and DiNunzio re: Ivie documentation			
14	AZ00000020	AZ00000022	Email from DiNunzio to Belknap re: Three Pieces of Documentation for Ivie			
15	AZ00000026	AZ00000027	Ivie 2018 Year End Review			
16	AZ00000032	AZ00000032	Email from Pomponi to DiNunzio re: Daliresp Follow Up			
17	AZ00000033	AZ00000033	Email from Belknap to Ivie CC DiNunzio and Weeks re: 1st Written Warning			
18	AZ00000034	AZ00000035	First written warning			
19	AZ00000044	AZ00000046	Email from Ivie to Belknap re: no access to the system and retaliation concerns			
20	AZ00000048	AZ00000048	Message from Belknap to Ivie about return to work after FMLA leave.			
21	AZ00000052	AZ00000054	DiNunzio self-assessment			
22	AZ00000064	AZ00000064	Email re: DiNunzio Response to Broussard message about COPD			
23	AZ00000065	AZ00000068	DiNunzio e-mail enclosing questions for Ivie			
24	AZ00000069	AZ00000071	Email from DiNunzio to Welch, Belknap, Hartman re: 2/18 discussion			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
25	AZ00000076	AZ00000077	Email DiNunzio to team, Pomponi re: Engaging with Insights			
26	AZ00000078	AZ00000078	Email from Ivie to DiNunzio re: medical leave			
27	AZ00000091	AZ00000091	Email from Grey to DiNunzio re: removing Ivie from Compliance Ambassador Role			
28	AZ00000092	AZ00000094	Email from Ivie re: AZ - 12/19 complaint			
29	AZ00000095	AZ00000096	Email from Grey to Pettineo re: Daliresp Sales promotional pieces			
30	AZ00000101	AZ00000103	Emails re: Daliresp promotion			
31	AZ00000124	AZ00000127	Email from Ivie to Pomponi re: Engaging with insights question			
32	AZ00000132	AZ00000132	Email from Ivie to Pomponi and Belknap re: Daliresp indication			
33	AZ00000133	AZ00000134	Deep Customer Insights - training			
34	AZ00000135	AZ00000137	Engaging with Insights Worksheet - training			
35	AZ00000154	AZ00000154	Email re: Engaging with Insights Follow-up			
36	AZ00000155	AZ00000155	January 2019 Insights notes - COPD stats			
37	AZ00000166	AZ00000166	Email from Ivie to Welch and Ceaser re: HR discussion recap			
38	AZ00000167	AZ00000168	Email from Kellum-Jackson to Abbonizio re: investigation into Ivie's appeal to written warning			
39	AZ00000169	AZ00000172	Email from Ceaser to Ivie re: Benatar nickname			
40	AZ00000191	AZ00000194	Email from DiNunzio to Abbonizio re: Seattle Region Leadership Meeting			
41	AZ00000195	AZ00000196	Email from Ivie to Ceaser and Gray re: summary of termination call			
42	AZ00000311	AZ00000395	Ivie personnel file			
43	AZ00000396	AZ00000396	Letter from Kellum-Jackson to Ivie re: response to appeal			
44	AZ00000402	AZ00000408	AstraZeneca & Medimmune U.S. Policy on FMLA			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
45	AZ00000410	AZ00000411	Email from Pomponi to Grey re: Daliresp			
46	AZ00000414	AZ00000415	Response from Pomponi to Ivie acknowledging receipt of Ivie's complaint.			
47	AZ00000416	AZ00000416	Email from Ivie to DiNunzio re: Fast Start			
48	AZ00000417	AZ00000417	January 2019 district meeting			
49	AZ00000430	AZ00000430	Email from Ivie to Grey about ambassadorship role			
50	AZ00000431	AZ00000431	January meeting with "old bus" v "new bus"			
51	AZ00000437	AZ00000437	Oct 2018 Coaching Days			
52	AZ00000441	AZ00000441	PDP spreadsheet			
53	AZ00000458	AZ00000458	2019 Coaching assessment - Ivie			
54	AZ00000463	AZ00000463	Oct 2018 coaching report			
55	AZ00000483	AZ00000484	Email from Belknap to Welch re: leave			
56	AZ00000494	AZ00000495	Email from Belknap to Welch re: leave			
57	AZ00000512	AZ00000513	Email from DiNunzio re: mediation			
58	AZ00000517	AZ00000520	Emails from Welch to McCullough, Ceaser re: termination			
59	AZ00000536	AZ00000540	Emails from Caesar to McCullough re: termination			
60	AZ00000545	AZ00000545	Email from DiNunzio to Ceaser re: termination form			
61	AZ00000559	AZ00000561	Emails between Ivie and DiNunzio re: coaching days after FMLA			
62	AZ00000581	AZ00000581	April 2019 DSM Coaching Days presentation			
63	AZ00000592	AZ00000594	Engaging with Insight Worksheet			
64	AZ00000616	AZ00000616	DALIRESP 2019 roadmap			
65	AZ00000700	AZ00000700	DiNunzio training history			
66	AZ00000782	AZ00000782	Ivie Coaching Reports			
67	AZ00000791	AZ00000794	Email from Pomponi to McCullough re: summary of case			
68	AZ00000795	AZ00000795	Email from Pomponi re: Ivie interview			
69	AZ00000796	AZ00000797	Email from Pomponi re: Ivie interview			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
70	AZ00000798	AZ00000808	Email re compliance investigation			
71	AZ00000809	AZ00000813	Email re compliance investigation			
72	AZ00000840	AZ00000841	Thomsen interview notes			
73	AZ00000854	AZ00000855	Email from DiNunzio to Gray re age discrim			
74	AZ00000856	AZ00000856	Seattle Region 2018 Kickoff Presentations			
75	AZ00000869	AZ00000877	DiNunzio investigation			
76	AZ00000878	AZ00000884	DiNunzio interview notes			
77	AZ00000885	AZ00000892	Compliance Report			
78	AZ00000893	AZ00000897	Broussard interview notes			
79	AZ00000898	AZ00000903	Clifford interview notes			
80	AZ00000904	AZ00000905	Cederlof interview notes			
81	AZ00000906	AZ00000909	Compliance documents			
82	AZ00000915	AZ00000920	Belknap HR documents			
83	AZ00000921	AZ00000923	DeVries interview notes			
84	AZ00000924	AZ00000930	Interview Summary			
85	AZ00000931	AZ00000933	Gray interview notes			
86	AZ00000934	AZ00000940	Hamilton interview notes			
87	AZ00000941	AZ00000941	Email from Pomponi to McCullough re: investigation into Ivie complaints			
88	AZ00000942	AZ00000942	Email from Belknap to DiNunzio re: unsubstantiated claims			
89	AZ00000943	AZ00000947	Email from Maratas re: insight picture			
90	AZ00000948	AZ00000948	Email from Hamilton to Pomponi re: Symbicort Insight			
91	AZ00000956	AZ00000959	Notes for Suzanne's 1st Written Warning, re: field coaching			
92	AZ00000960	AZ00000963	Notes for DiNunzio appeal of 1st Written Warning			
93	AZ00000969	AZ00000973	Thomsen interview notes			
94	AZ00000983	AZ00000991	Investigation findings			
95	AZ00000992	AZ00000995	HR investigative documents			
96	AZ00000997	AZ00000997	Belknap and DiNunzio texts re: speaking about Ivie			
97	AZ00000998	AZ00000998	Belknap and DiNunzio texts re: Ivie			
98	AZ00000999	AZ00000999	Belknap and DiNunzio texts re: Ivie			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
99	AZ00001000	AZ00001000	Belknap and DiNunzio texts re: departure			
100	AZ00001001	AZ00001001	Belknap and DiNunzio texts re: departure			
101	AZ00001002	AZ00001002	DiNunzio and Gray texts re: Ivie complaints			
102	AZ00001006	AZ00001006	DiNunzio and Gray texts re: Ivie			
103	AZ00001010	AZ00001010	DiNunzio and Gray texts			
104	AZ00001014	AZ00001014	Text messages re: Ivie			
105	AZ00001015	AZ00001015	DiNunzio and Gray texts re: Ivie			
106	AZ00001016	AZ00001016	DiNunzio and Gray texts re: Ivie			
107	AZ00001017	AZ00001017	DiNunzio and Gray texts re: Ivie			
108	AZ00001018	AZ00001018	DiNunzio and Welch texts re: Ivie			
109	AZ00001019	AZ00001019	DiNunzio and Welch texts re: Ivie			
110	AZ00001021	AZ00001022	Emails re Maratas PIP			
111	AZ00001023	AZ00001025	Maratas PIP			
112	AZ00001026	AZ00001029	HR Standards of Conduct			
113	AZ00001030	AZ00001032	HR Disciplinary Policy			
114	AZ00001033	AZ00001039	Code of Ethics 2017			
115	AZ00001040	AZ00001044	AZ Harassment Policy			
116	AZ00001045	AZ00001123	US Policy Handbook			
117	AZ00001124	AZ00001126	HR USA - EEO Policy			
118	AZ00001127	AZ00001133	AstraZeneca Code of Ethics 2019			
119	AZ00001134	AZ00001137	HR Open Door Policy			
120	AZ00001138	AZ00001138	Stephanie DiNunzio Certifications			
121	AZ00001139	AZ00001142	Compliance Guidance for Field Based Roles			
122	Ivie00000001	Ivie00000002	Ivie complaints			
123	Ivie00000008	Ivie00000017	Email with TGrey about Engaging with Insights training			
124	Ivie00000089	Ivie00000097	Effective communication guidelines 2019			
125	Ivie0000154	Ivie0000155	Ivie's resume			
126	Ivie0000226	Ivie0000228	Ivie to Grey and Pomponi requesting help			
127	Ivie0000422	Ivie0000427	Medical Records - Dr. Byrne			
128	Ivie0000429	Ivie0000430	Letter to migraine specialist			
129	Ivie0000433	Ivie0000454	Medical Records - Dr. Johnson			
130	Ivie0000456	Ivie0000464	Medical Records Dr. Byrne			
131	Ivie0000465	Ivie0000473	Medical Records - Dr. Byrne			
132	Ivie0000522	Ivie0000527	Medical Records - Dr. Byrne			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
133	Ivie0000530	Ivie0000533	Emergency Room Visit			
134	Ivie0000535	Ivie0000535	Belknap to DiNunzio re: return to work			
135	Ivie0000559	Ivie0000560	Ivie to Grey re: removal from compliance role			
136	Ivie0000561	Ivie0000563	Emails between Ivie and Belknap re: request for help			
137	Ivie0000564	Ivie0000566	Emails between Ivie and Belknap re: request for help			
138	Ivie0000573	Ivie0000576	Emails between Ivie and Belknap re: request for help			
139	Ivie0000581	Ivie0000582	Belknap to Ivie re: transition to Ceaser			
140	Ivie0000592	Ivie0000594	Email from Ivie to Ceaser re: investigation recap and mediation			
141	Ivie0000620	Ivie0000623	Email from Cherry to DiNunzio re: coach app			
142	Ivie0000663	Ivie0000667	Ivie to Pomponi re: investigation and further concerns			
143	Ivie0000743	Ivie0000743	Kellum-Jackson to Ivie re: appeal			
144	Ivie0000748	Ivie0000748	Email from DiNunzio to team re: budget			
145	Ivie0000749	Ivie0000750	Email from DiNunzio to Ivie re: speaker budget program			
146	Ivie0000751	Ivie0000752	Email from Ivie to team re: national leadership			
147	Ivie0000753	Ivie0000754	Emails between Ivie and DiNunzio re: quick turnaround			
148	Ivie0000813	Ivie0000813	Emails re: DiNunzio to team re: budget			
149	Ivie0000816	Ivie0000816	Excerpt from AZ PowerPoint re: contributions			
150	Ivie0000819	Ivie0000820	Email from DiNunzio to team re: budget			
151	Ivie0000821	Ivie0000823	Email from DiNunzio to team re: budget			
152	Ivie0000824	Ivie0000825	Email from DiNunzio to DSMs re: budget			
153	Ivie0000827	Ivie0000827	Q1 2019 Travel Budget			
154	Ivie0000828	Ivie0000829	DiNunzio to team re: budget for fast start meetings			
155	Ivie0000830	Ivie0000831	DiNunzio to team re: budget			
156	Ivie0000832	Ivie0000835	Q2 2019 Budget - FDR			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
157	Ivie0000836	Ivie0000836	DiNunzio to Ivie re: Q2 budget			
158	Ivie0000839	Ivie0000839	Concur notice re: virtual meetings			
159	Ivie0000848	Ivie0000851	DiNunzio to team re: performance			
160	Ivie0000886	Ivie0000892	Ivie to team re: sales performance			
161	various		Compilation exhibit -Emails re: awards and positive feedback			
162	Ivie0000895	Ivie0000901	Positive feedback from DiNunzio			
163	Ivie0000984	Ivie0000994	Emails about Ivie not having access to coaching app after return			
164	Ivie0001106	Ivie0001107	Q4 2017 budget numbers			
165	Ivie0001173	Ivie0001175	Performance awards			
166	Ivie0001250	Ivie0001269	Daliresp insert			
167	Ivie0001270	Ivie0001278	Matrix Sales Overview			
168	Ivie0001279	Ivie0001279	Symbicort performance			
169	Ivie0001303	Ivie0001307	Ivie e-mails to team and DiNunzio re: Symbicort			
170	Ivie0001327	Ivie0001328	DiNunzio re:National Leadership Team			
171	Ivie0001477	Ivie0001477	AZ to Ivie re: Symbicort market share award			
172	Ivie0001491	Ivie0001504	Texts from VP of sales re: good performance			
173	Ivie0001655	Ivie0001655	Pharmaceutical Sales Rep of the Year			
174	Ivie0001757	Ivie0001759	Performance certifications			
175	various		Compilation exhibit re: Coaching App			
176	Ivie0002310	Ivie0002310	Circle of Excellence Award			
177	Ivie0002026	Ivie0002027	DiNunzio to Ivie re: coaching numbers			
178	Ivie0000890	Ivie0000892	DiNunzio to Ivie re: Symbicort coaching plan			
179	Ivie000889	Ivie000889	DiNunzio to Ivie re:Spokane team			
180			Corporate Integrity Agreement			
181			AstraZeneca U.S. Compliance Program			
182			Respiratory Sales 2018			
183			Rebuttal Exhibit: Oregon Website COPD Statistics			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
184			Rebuttal Exhibit: Select Task Force on the Study of Harassment in the Workplace – Report of Co-Chairs Chai R. Feldblum & Victoria A. Lipnic			
185			Impeachment Exhibit			
186			Impeachment Exhibit			
187			Impeachment Exhibit			
188			Impeachment Exhibit			
189			Impeachment Exhibit			
190			Impeachment Exhibit			
191			Impeachment Exhibit			
192			Impeachment Exhibit			
193			Impeachment Exhibit			
194			Impeachment Exhibit			
195			Impeachment Exhibit			
196			Impeachment Exhibit			
197			Impeachment Exhibit			
198	AZ00000487	AZ00000489	Mutual Consent Release			
199			5/10/2018 Email from Stephanie DiNunzio to Larry Hinson re: Performance			
200	AZ00000148	AZ00000149	Engaging with Insight Training Email			
201	AZ00000023	AZ00000025	Comments on 2/18 Suzanne Ivie Discussion			

Dated: June 3, 2021

Respectfully submitted,

/s/ Anita M. Chambers

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Attorney for AstraZeneca Pharmaceuticals, LP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

SUZANNE IVIE,

Plaintiff,

vs.

**ASTRAZENECA
PHARMACEUTICALS, LP,**

Defendant.

No. 3:19-CV-01657-JR

**DEFENDANT ASTRAZENECA
PHARMACEUTICALS' TRIAL EXHIBIT
LIST**

Pursuant to the Court's Jury Trial Management Order dated April 29, 2021 (Dkt. No. 68), Defendant AstraZeneca Pharmaceuticals, LP ("AstraZeneca") hereby submits its trial exhibit list.

AstraZeneca reserves the right to offer any exhibits listed by Plaintiff Suzanne Ivie ("Ivie"), the right not to offer any exhibits listed below, and the right to add to, revise, or delete from this list as issues are identified or in response to court orders during pretrial proceedings. Demonstrative, rebuttal, and impeachment exhibits are not listed, pursuant to court orders for local practice.

With respect to those exhibits submitted pursuant to Fed. R. Evid. 1006, AstraZeneca reserves the right to submit the underlining voluminous records or revised or additional summaries of such records.

Inclusion of a particular document on AstraZeneca's exhibit list is not intended to be a waiver of AstraZeneca's right to object to the introduction, admissibility and/or authenticity of that document for any purpose.

EXHIBIT NO.	DESCRIPTION	Bates	MARKED	OFFERED	REC'D
501.	January 15, 2019 email from Stephanie DiNunzio to Karen Belknap	AZ00000001-03			
502.	February 18, 2019 email from Stephanie DiNunzio to Karen Belknap	AZ00000020-22			
503.	February 19, 2019 email from Stephanie DiNunzio to Karen Belknap and Amy Welch	AZ00000023-25			
504.	DiNunzio notes of 6/15/18 Bimonthly discussion with Suzanne Ivie	AZ00000025			
505.	March 4, 2019 email between Stephanie DiNunzio and Michael Pomponi	AZ00000032			
506.	March 5, 2019 email from Karen Belknap to Suzanne Ivie re First Written Warning with March 1, 2019 Disciplinary Record of Ms. Ivie	AZ00000033-35			
507.	December 18, 2018 email from Stephanie DiNunzio to Suzanne Ivie	AZ00000055, 845			
508.	Engage with Insight Worksheet	AZ00000135-37			
509.	June 5, 2019 email from Stephanie DiNunzio to Linda Abbonizio	AZ00000191-94			
510.	2018 End of Year Review of Suzanne Ivie	AZ00000331-340			
511.	2017 End of Year Review of Suzanne Ivie	AZ00000341-48			

512.	2016 End of Year Review of Suzanne Ivie	AZ00000349-57			
513.	2015 End of Year Review of Suzanne Ivie	AZ00000358-75			
514.	2014 Global Performance Management (DSM) Annual Review of Suzanne Ivie	AZ00000376-85			
515.	2013 Global Performance Management (DSM) Annual Review of Suzanne Ivie	AZ00000386-94			
516.	March 25, 2019 email from US Field Tools	AZ00000427-29			
517.	Excerpt to the Seattle Region 2019 Kick Off Call PowerPoint, dated January 7, 2019	AZ00000431			
518.	February 25, 2019 email between Karen Belknap and Suzanne Ivie	AZ00000471-72			
519.	June 5, 2019 email from Stephanie DiNunzio to Dawn Ceaser	AZ00000514-16			
520.	May 29, 2018 email from Stephanie DiNunzio	AZ00000547-51			
521.	May 28, 2019 email from Stephanie DiNunzio	AZ00000582-85			
522.	April 4, 2018 email from Stephanie DiNunzio	AZ00000817-19 & AZ00000549			
523.	January 22, 2019 email from Stephanie DiNunzio to Suzanne Ivie	AZ00000851-53			
524.	February 28, 2019 email from Genie Hamilton	AZ00000948-55			
525.	Stephanie DiNunzio's Text Messages with Karen Belknap	AZ00000996			
526.	HR USA – Standards of Conduct	AZ00001026-29			
527.	AstraZeneca Code of Ethics, Effective Date: 9/5/2017, Effective Due: 8/30/2019	AZ00001033-39			
528.	US Policy Handbook, October 2018	AZ00001046-1123			
529.	HR USA – Equal Employment Opportunity Policy	AZ00001124-26			

530.	HR USA – Open Door Procedure	AZ00001134-37			
531.	March 26, 2018 email from Stephanie Orgren	AZ00001143-1213			
532.	Sharing Background Information, Compliance Job Aid	AZ00001212-13			
533.	Photo of Suzanne Ivie	Ivie 0000744			
534.	December 2018 Circle of Excellence Report	--			
535.	May 2019 Circle of Excellence Report	--			
536.	December 2019 Circle of Excellence Report	--			
537.	February 2021 Circle of Excellence Report	--			
538.	August 2020 Seattle Region Pulse Survey Results	--			
539.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 05)	--			
540.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 06)	--			
541.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 07)	--			
542.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 12)	--			
543.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 14)	--			
544.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 18)	--			
545.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 20)	--			
546.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 24)	--			
547.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 26)	--			
548.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 28)	--			
549.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 29)	--			
550.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 30)	--			
551.	Suzanne Ivie's Text Message	--			

	Records (Ivie Dep. Ex. 32)				
552.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 34)	--			
553.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 35)	--			
554.	Suzanne Ivie's Text Message Records (Ivie Dep. Ex. 37)	--			
555.	Field Coaching Report for Craig Barnes	--			
	<i>[Reserved for additional impeachment exhibits]</i>				
566.	Impeachment Exhibit				
567.	Impeachment Exhibit				
568.	Impeachment Exhibit				
569.	Impeachment Exhibit				
570.	Impeachment Exhibit				
571.	Impeachment Exhibit				
572.	Impeachment Exhibit				
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578.	Impeachment Exhibit				
579.	Impeachment Exhibit				

Dated this 10th day of May, 2021.

Respectfully submitted,

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